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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| Proceeding | 91171222 |
|---------------------------|---|
| Party | Defendant Raysat Cyprus Ltd. Raysat Cyprus Ltd. Emergo House 3 Poseidonos Street CYX Nicosa, 1507 |
| Correspondence Address | Jennifer D. Silverman Wolf, Block, Schorr and Solis-Cohen LLP 250 Park Avenue New York, NY 10177 |
| Submission | Answer |
| Filer's Name | Jennifer D. Silverman |
| Filer's e-mail | jsilverman@wolfblock.com |
| Signature | /Jennifer D. Silverman/ |
| Date | 07/17/2006 |
| Attachments | Answer to Notice of Opposition.pdf (8 pages)(197308 bytes) |

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

| Central Mfg. Inc., | |
|-------------------------|-------------------------|
| d/b/a Central Mfg. Co., | |
| Opposer,) | |
| v.) | Opposition No. 91171222 |
| Raysat Cyprus Ltd., | |
| Applicant.) | |

Answer to Notice of Opposition

Applicant, Raysat Cyprus Ltd., by its attorneys, hereby answers the allegations set forth in the Notice of Opposition as follows:

- 1. Paragraph 1 of the Notice of Opposition contains no allegations which require either an admission or a denial.
- 2. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 2 of the Notice of Opposition and therefore denies the same.
- 3. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegation contained in Paragraph 3 of the Notice of Opposition regarding priority of use of the STEALTH mark and therefore denies the same. Applicant denies the remaining allegations in Paragraph 3 of the Notice of Opposition.
- 4. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 4 of the Notice of Opposition and therefore denies the same.

- 5. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 5 of the Notice of Opposition and therefore denies the same.
- 6. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 6 of the Notice of Opposition and therefore denies the same.
- 7. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 7 of the Notice of Opposition and therefore denies the same.
- 8. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 8 of the Notice of Opposition and therefore denies the same.
- 9. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 9 of the Notice of Opposition and therefore denies the same.
- 10. Applicant denies each and every allegation contained in Paragraph 10 of the Notice of Opposition.
- 11. Applicant denies each and every allegation contained in Paragraph 11 of the Notice of Opposition.

- 12. Applicant denies each and every allegation contained in Paragraph 12 of the Notice of Opposition.
- 13. Applicant denies each and every allegation of this Paragraph, except that Applicant admits that, if granted the registration herein opposed, it would obtain at least a *prima* facie exclusive right to the use of its mark.
- 14. Applicant denies each and every allegation contained in Paragraph 14 of the Notice of Opposition.
- 15. Applicant denies each and every allegation contained in Paragraph 15 of the Notice of Opposition.
- 16. Applicant denies each and every allegation contained in Paragraph 16 of the Notice of Opposition.
- 17. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 17 of the Notice of Opposition and therefore denies the same.
- 18. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 18 of the Notice of Opposition and therefore denies the same.
- 19. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 19 of the Notice of Opposition and therefore denies the same.

- 20. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegation contained in Paragraph 20 of the Notice of Opposition that "Opposer is the exclusive worldwide Licensor of the Mark STEALTH as listed in the 1999 Licensing Resource Directory." Applicant denies the remaining allegations in Paragraph 20 of the Notice of Opposition.
- 21. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 21 of the Notice of Opposition and therefore denies the same.
- 22. Applicant denies each and every allegation contained in Paragraph 22 of the Notice of Opposition.
- 23. Applicant denies each and every allegation contained in Paragraph 23 of the Notice of Opposition.
- 24. Applicant is without having knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 24 of the Notice of Opposition and therefore denies the same.
- 25. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 25 of the Notice of Opposition and therefore denies the same.
- 26. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 26 of the Notice of Opposition and therefore denies the same.

- 27. Applicant denies each and every allegation contained in Paragraph 27 of the Notice of Opposition.
- 28. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 28 of the Notice of Opposition and therefore denies the same.
- 29. Applicant denies each and every allegation contained in Paragraph 29 of the Notice of Opposition.
- 30. Applicant denies each and every allegation contained in Paragraph 30 of the Notice of Opposition.
- 31. Applicant denies each and every allegation contained in Paragraph 31 of the Notice of Opposition.
- 32. Applicant is without knowledge or information sufficient to form a belief as to the truth of the allegations contained in Paragraph 32 of the Notice of Opposition and therefore denies the same.
- 33. Applicant denies each and every allegation contained in Paragraph 33 of the Notice of Opposition.
- 34. Applicant denies each and every allegation contained in this paragraph, except Applicant admits that the term STEALTHRAY is comprised of the words STEALTH and RAY.
- 35. Applicant denies each and every allegation contained in Paragraph 35 of the Notice of Opposition.

- 36. Applicant denies each and every allegation contained in Paragraph 36 of the Notice of Opposition.
- 37. Applicant denies each and every allegation contained in Paragraph 37 of the Notice of Opposition.
- 38. Applicant denies each and every allegation contained in Paragraph 38 of the Notice of Opposition.
- 39. Applicant denies each and every allegation contained in Paragraph 39 of the Notice of Opposition.
- 40. Applicant denies each and every allegation contained in Paragraph 40 of the Notice of Opposition.
- 41. Applicant denies each and every allegation contained in Paragraph 41 of the Notice of Opposition.
- 42. Applicant denies each and every allegation contained in Paragraph 42 of the Notice of Opposition.
- 43. Applicant denies each and every allegation contained in Paragraph 43 of the Notice of Opposition.
- 44. Applicant denies each and every allegation contained in Paragraph 44 of the Notice of Opposition.
- 45. Applicant denies each and every allegation contained in Paragraph 45 of the Notice of Opposition.

46. Applicant denies each and every allegation contained in Paragraph 46 of the

Notice of Opposition.

47. Applicant denies each and every allegation contained in Paragraph 47 of the

Notice of Opposition.

48. Applicant denies each and every allegation contained in Paragraph 48 of the

Notice of Opposition.

49. Applicant is without knowledge or information sufficient to form a belief as to the

truth of the allegations contained in Paragraph 49 of the Notice of Opposition and therefore

denies the same.

WHEREFORE, Applicant Requests that this Opposition No. 91171222 be dismissed

with prejudice.

Dated: New York, NY

July 17, 2006

Respectfully submitted,

WOLF, BLOCK, SCHORR & SOLIS-

COHEN LLP

Bv:

Jennifer D. Silverman

Attorneys for Applicant

250 Park Avenue

New York, NY 10024

(212) 883-4966

CERTIFICATE OF SERVICE

I hereby certify that a copy of the Answer to Notice of Opposition was sent by First-Class prepaid mail to Opposer:

Leo Stoller, President, MFG. Inc. 7115 W. North Avenue #272, Oak Park, IL 60302

on July 17, 2006

Ву: